

## Capacity Management, Operation, and Maintenance Program Assessment

1. By January 1, 2015, the Authority will submit a Capacity, Management, Operation and Maintenance (“CMOM”) Program Assessment to EPA and CTDEEP. The CMOM Program Self-Assessment shall be conducted in accordance with EPA’s Guide for Evaluating Capacity, Management, and Maintenance (CMOM) Program at Sanitary Sewer Collection Systems (the “Guide for Evaluating CMOM Programs”), included as Attachment 1. For each item, clearly identify if the Authority plans future actions based on assessment findings. The CMOM Program Assessment shall include, at a minimum, the following elements:
  - a. Training and Safety:
    - i. An assessment of the training provided to each member of the staff with duties including collection system operation and maintenance;
    - ii. An assessment of the safety equipment provided for each member of the staff with duties including collection system operation and maintenance;
  - b. Computerized Maintenance Management System (CMMS):
    - i. An assessment of procedures for the management of customer service requests, including entry and close-out of requests in the CMMS;
    - ii. An assessment of procedures for notification of work crews of customer service requests;
    - iii. An assessment of procedures for incorporating work crew observations into collection system conditions records and bypasses reports;
    - iv. An assessment of procedures for timely performance of and documentation of all required bypass notifications;

- v. An assessment of the Authority's programs to coordinate rehabilitation and replacement projects with information entered into the CMMS;
- c. Hydrogen Sulfide Monitoring and Control: An assessment of the comprehensive monitoring program described in the Authority's CMOM Plan.
- d. Inspections and Condition Assessments:
  - i. An assessment of the implementation of the Preventative Maintenance Program described in the Authority's CMOM Plan, including the Authority's Preventative Maintenance Program.
  - ii. An assessment of the age, condition, materials, and last date of inspection of each element of the collection system;
  - iii. An assessment of the Authority's programs for sewer inspections;
- e. Capacity: An assessment of the capacity of critical elements of the collection system, including the Union Pump Station and other locations associated with unauthorized bypasses during wet weather;
- f. Inflow and Infiltration (I/I):
  - i. An assessment of the Authority's and the City of New Haven's legal authority to remove roof leaders, sump pumps, and other drainage connections to the collection system;
  - ii. An assessment of the Authority's program for removing roof leaders, sump pumps, and other drainage connections in partially separated sewer areas;

- iii. An assessment of the legal authority that the Authority and the towns of East Haven, Hamden, and Woodbridge have to remove roof leaders, sump pumps, and other drainage connections to the sewer collection system;
  - iv. An assessment of the Authority's use of hydraulic modeling for I/I quantification;
  - v. An assessment of the Authority's programs to control inflow of storm water at Combined Sewer Overflow (CSO) regulators;
  - vi. An assessment of the Authority's programs for funding and implementing I/I studies and Sewer System Evaluation Surveys (SSESs).
- g. Collection System Maintenance:
  - i. An assessment of the Authority's programs for rehabilitating or replacing sewers to address operational problems, such as blockages;
  - ii. An assessment of the Authority's programs for rehabilitating or replacing sewers to address structural problems identified in inspections, condition assessments, I/I studies, and SSESs.
- h. Fats, Oils, and Grease (FOG): An assessment of the efficacy of the Authority's FOG programs, including public education programs to address blockages in residential neighborhoods;
- i. Pump Stations:
  - i. An assessment of routine inspections and maintenance at all pump stations;
  - ii. An assessment of the Authority's schedules for comprehensive conditions assessments for all pump stations;

- iii. An assessment of conditions for all pump stations;
- iv. An assessment of the availability of an alternate power source at each pump station and CSO storage tank;
- v. An assessment of the planned deployment of portable generators during a system-wide electrical outage;
- vi. An assessment of equipment redundancy available for each pump station and CSO storage tank;
- j. Siphons: An assessment of procedures for operation and maintenance of the Authority's siphons.
- k. Force Mains: An assessment of procedures for operation and maintenance of the Authority's force mains.
- l. Easements:
  - i. An assessment of the Authority's easement clearing program;
  - ii. An assessment of the Authority's program to repair, raise to grade, and permanently mark sewer manholes in easements;
  - iii. An assessment of the Authority's program to inspect gravity sewers above grade following each significant rain event;

#### CMOM Corrective Action Plan

- 2. By April 1, 2015, the Authority will submit a CMOM Corrective Action Plan to EPA and CTDEEP that includes the following:
  - a. A description of the specific short and long-term actions that the Authority is taking, or plans to take, to address any of the deficiencies identified during the completion of the CMOM Program Assessment and

- b. A schedule for implementation of the CMOM Corrective Action Plan (the “CMOM Corrective Action Plan Implementation Schedule”).

CMOM Program Annual Report

- 3. Until further notice from EPA, beginning January 31, 2016, and each January 31 annually thereafter, submit a report (the “CMOM Program Implementation Annual Report”). At a minimum, the CMOM Program Implementation Annual Report shall include the following:
  - a. A detailed description of the actions taken by the Authority during the previous calendar year, or known by the Authority to have been taken by other parties, to resolve any deficiencies identified during in the CMOM Corrective Action Plan;
  - b. Any other actions taken to reduce the frequency, duration, and volume of unauthorized bypasses from the Authority’s collection system during the previous calendar year;
  - c. A summary listing of all unauthorized bypasses in the Authority’s collection system. The listing shall be provided electronic spreadsheet and shall include all information from CT DEEP’s Bypass Report Form, plus:
    - i. A clear statement of whether the release did or did not reach any surface water;
    - ii. A clear statement of whether the release did or did not reach a stormwater catch basin or any other portion of the City’s municipal separate storm sewer system (“MS4”);

- iii. If the release reached any portion of the City's MS4, the Authority shall provide a description of the exact location where the release reached the surface water;
- d. A projection of the actions that will be taken during the current calendar year to resolve any deficiencies identified in the CMOM Corrective Action Plan.